

# MUKASEY FRENCHMAN

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February 16, 2023

**VIA ECF**

Honorable Paul G. Gardephe  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Gulkarov, et al.* (Def. Robert Wisnicki), 22 Cr. 020 (PGG)**

Dear Judge Gardephe:

We represent Defendant Robert Wisnicki. We submit this letter to request a modification of the conditions of Mr. Wisnicki's release on bail. The Government consents to this request and Pretrial Services has no objection to it.

We respectfully ask the Court to permit Mr. Wisnicki to travel with his family to Los Angeles, California from April 3-10, 2023 to observe the Passover holiday.

Respectfully submitted,

/s/ Kenneth A. Caruso  
Kenneth A. Caruso

cc: AUSA Louis Pellegrino  
AUSA Mathew Andrews  
Pretrial Services Officer Robert Stehle (via email)

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
**Paul G. Gardephe, U.S.D.J.**

Dated: February 21, 2023